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Attorney for Plaintiff and Judgment Creditor LEE BITTNER

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re: RONALD GEORGE DEPAUL,
Debtor.

CASE NO.: 13-11075-LA7
ADVERSARY CASE NO.: 14-90021-LA

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION
FOR SUMMARY JUDGMENT**

LEE BITTNER,
Plaintiff,

Date: August 28, 2014
Time: 10:30 a.m.
Courtroom: 2

v.

RONALD GEORGE DEPAUL,
Defendant.


TO DEFENDANT RONALD DEPAUL AND HIS ATTORNEY OF RECORD:

NOTICE IS HEREBY GIVEN that on August 28, 2014 at 10:30 a.m., or as soon thereafter as counsel may be heard by the above-entitled Court, located at 325 West F Street, San Diego, California, Plaintiff Lee Bittner will and hereby does, move the Court for summary judgment on the grounds that there is no genuine issue as to material facts and that the moving party is entitled to judgment as a matter of law, for the reason that the May 20, 2013 Default Judgment entered by the Superior Court of the State of California, County of San Diego, in the amount of \$94,870, a copy of which is attached to the Complaint as Exhibit A, collaterally estops Defendant and has a conclusive effect in this Court.

1 This motion is based on this Notice of Motion and Motion, the accompanying Memorandum
2 of Points and Authorities, the Request for Judicial Notice attached hereto, all pleadings and papers
3 on file in this action, and upon such other matters as may be presented to the Court at the time of
4 the hearing.

5 LAW OFFICES OF GREGORY Y. LIEVERS

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7 Dated: 7.2.14


8 GREGORY Y. LIEVERS, ESQ.
9 Attorneys for Plaintiff and Judgment Creditor
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